

FORD & HUFF LC
ATTORNEYS AT LAW

October 12, 2022

Hon. Sarah Netburn
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: Joint Update on Discovery Status

Stephen Gannon v. Great World Enterprises, Inc., et al.
Case # 22-cv-1032

Dear Judge Netburn,

This law firm represents Plaintiff Stephen Gannon ("Plaintiff") in this action. We write to you jointly with counsel for Defendant Great World Enterprises Inc. ("Great World"), in accordance with the instruction in the Case Management Plan and Scheduling Order (Docket No. 22) to inform the Court about the status of discovery and settlement discussions. Neither counsel has been in communication with Defendant Pramukh 200 Inc ("Pramukh").

Mr. Rapaport, counsel for Great World, and Plaintiff's counsel have continued settlement discussions. While a settlement has not been reached, the parties are hopeful that a settlement might be achievable. Discussions between Mr. Ford and Mr. Rapaport are ongoing. Great World's counsel has advised that the tenant/co-defendant, Pramukh, has vacated the subject premises. This may impact the prospects of settlement.

It is still hoped that the case might settle, but the parties intend to finish fact discovery prior to December 16, 2022 as set forth in the Scheduling Order.

We thank the court for its attention in this matter.

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Re: Joint Update on Case Discovery and Settlement Discussions

September 9, 2022

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Respectfully Submitted,

/s/Adam Ford

Adam Ford

Ford & Huff LC

Counsel to Plaintiff

/s/ Marc Rapaport

Marc Rapaport

Rapaport Law

Counsel to Defendant Great World Enterprises, Inc.

cc: All Counsel of Record (via ECF)